



United States Environmental Protection Agency
Region 6
1200 Elm Street, Suite 500
Dallas, Texas 75270

MEMORANDUM

SUBJECT: Request for an Exemption from the 12-Month Statutory Limitation of the Time-Critical Removal Action at the American Creosote DeRidder Superfund Site, DeRidder, Beauregard Parish, Louisiana

FROM: Adam Adams, On-Scene Coordinator
Readiness and Emergency Response Team (6SEDER)

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THRU: Craig Carroll, Chief
Emergency Management Branch (6SEDE)

Craig B Carroll

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TO: Wren Stenger, Director
Superfund and Emergency Management Division (6SED)

I. PURPOSE

The purpose of this memorandum serves as an amendment to the December 18, 2019 signed Action Memorandum and requests approval for a 12-month statutory exemption for a removal action pursuant to the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), 42 U.S.C. § 9601 et seq., for the American Creosote DeRidder Superfund Site, DeRidder, Beauregard Parish, Louisiana (the "Site"). This memorandum also requests to extend the Scope of Work to off-site potentially impacted areas. The proposed Removal Action involves the removal and off-site treatment and/or disposal of contaminated surface soils and waste material associated with the Site. This action is being conducted at the request of and support to the EPA Remedial Program. This time extension is necessitated by the temporary shutdown of the Removal Action on March 27, 2020 due to Covid-19 pandemic conditions in the EPA Region 6 area of operation.

The proposed plan of action meets the criteria for initiating a removal action under Section 300.415 of the National Contingency Plan (NCP), 40 C.F.R. § 300.415. This action is expected to require less than twelve months from the remobilization. The initial Action Memorandum provided approval for a waiver to the \$2 million statutory limitation, as the waiver was appropriate according to the Consistency Exemption and funding is via a Special Account.



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II. SITE CONDITIONS AND BACKGROUND

CERCLIS:	LAN 00060 4293
Category of Removal:	Time Critical
Site ID:	A6KM
Latitude:	30.831693 North
Longitude:	-93.276863 West

A. Site Description

1. Removal Site Evaluation

The Site has been impacted by creosote related compounds from past timber treatment operations. The Shreveport Creosoting Company operated a timber treatment facility at the Site from the early 1920's to approximately 1957 that utilized creosote oil and coal tar solutions. The specific operations at the site consisted of dipping timber into creosote vats and the collection of spent creosote in an open pit and also the discharging of untreated process wastewater into an unlined wastewater pit. The facility has been inactive since 1957. Remains of the facility have been abandoned and left onsite along with waste associated with the past operations.

Several site investigations have taken place at the Site between 1991 and 2018. These site investigations included a Site Inspection (SI) conducted in May 2016 and a Remedial Investigation (RI) in 2018 by EPA. The SI resulted in adding the Site to the National Priorities List (NPL) on January 9, 2018, and the RI characterized the nature and extent of the contamination at the Site. Through the past site investigations, EPA identified numerous hazardous substances including total petroleum hydrocarbons (TPHs), polycyclic aromatic hydrocarbons (PAHs), and metals that have contaminated the Site, as well as migrated offsite via overland surface water flow and ground water. Specific contaminants of concern (COCs) include acenaphthene, acenaphthylene, anthracene, arsenic, benzo (a) anthracene, benzo (a) pyrene, benzo (g,h,i) perylene, benzo (b) fluoranthene, benzo (k) fluoranthene, 1,1'-biphenyl, bis (2-ethylhexyl) phthalate, cadmium, carbazole, chromium, chrysene, cobalt, dibenzo (a,h) anthracene, dibenzofuran, fluoranthene, fluoranthene, fluorene, indeno (1,2,3-cd) pyrene, lead, manganese, mercury, 1-methylnaphthalene, 2-methylnaphthalene, naphthalene, nickel, phenanthrene, pyrene, silver, thallium, and zinc. In addition, three source areas were identified based on historic site activities and COC concentrations. These source areas include: 1) Concrete Structure of a Former Retort House, 2) Concrete Foundation of a Former Vat (Oil/Water Separator), and 3) Unlined Waste Water Pit.

2. Physical Location

The Site is located near the southwest intersection of Post Plant Road and Butler Blvd in the city of DeRidder, Beauregard Parish, Louisiana. The 55-acre tract continues in a southwestern direction toward the intersection of the rail corridor and Washington Street near the Westvaco Plant. The railroad corridor at this point is approximately 100 feet wide. The centerline of the track is the midpoint of the corridor. The Site is bounded on the north by a rural roadway, to the east by heavy brush, to the south by undeveloped land, and to the west by the Burlington Northern Santa Fe (BNSF) Railroad spur, currently used by Mead Westvaco Corporation. The Site's broader surroundings include commercial, industrial, and residential uses. Additionally,

the Site was once located in the now obsolete Bundick's Creek Game and Fish Reserve Watershed Basin. Based on an American Community Survey 5-Year Population Estimate for 2008-2012, an estimated 1,491 persons live within a 1-mile radius of the Site. A Site Location Map is provided as Figure 2 below.

Figure 1. Location within the Region.



Figure 2. Site Location.

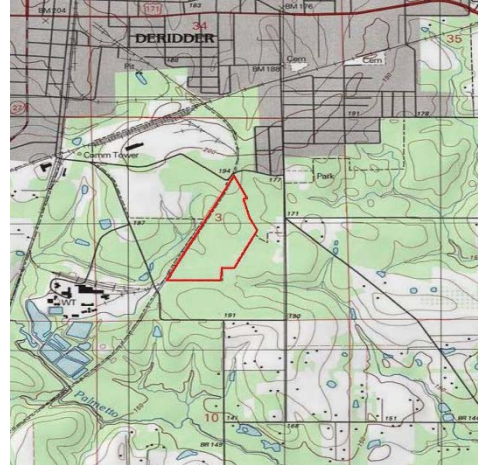


Figure 3. Aerial view of the Site and adjacent property to the southeast.



3. Site Characteristics

The Site consists of the abandoned facility that is covered by heavy timber and thick shrub overgrowth. The Site is characterized by a gently rolling topography, mild winters and hot/humid summers, silty clayey sands and sandy silty clay soils. The average elevation of the Site is 150 feet above mean sea level. The Site area primarily consists of pine; however, a variety of oak and cypress are present in the low bottom areas within which drainage tributaries meander.

Visual evidence reveals surface impact to the down gradient drainage pathway. Drainage from the former facility footprint flows to the south southwest approximately 425 feet to a culvert toward the west and then further southwest.

Three source areas of concern are identified that contain hazardous substances, pollutants or contaminants that are not secured and pose a risk to the public and environment. Source Area 1 is a concrete structure with a pit that was the former retort house. The pit is shown in Figure 4 and contains liquids and sediments. Source Area 2 is a concrete foundation of a former vat (oil/water separator) and is shown in Figure 5a and 5b. Source Area 3 is an unlined wastewater pit as shown in Figures 6a and 6b.



Figure 4. Source Area 1. Concrete Structure.

Constituent concentrations were measured in Source Area 1 above EPA Removal Management Levels (Target Risk = $1\text{E-}04$; Hazard Index = 1) for industrial soils in the 2015 EPA sampling:

Table 1. Source Area 1 Concentrations.

Constituent	Concentration (mg/kg)	EPA RML (mg/kg)
	2015 Remedial	(Industrial Soil; TR $1\text{E-}04$; HI=1)
Source Area 1. Concrete Structure Soil		
Benz(a)anthracene	5,400	2,100 (c)
Benzo(a)pyrene	3,300	210 (c) / 220 (nc)
Benzo(b)fluoranthene	4,500	2,100 (c)

TR: Target Risk = $1\text{E-}04$. HI: Hazard Index = 1. (c): carcinogenic. (nc): non-carcinogenic.

Figure 5a. and b. Source Area 2. Oil / Water Separator.



Constituent concentrations were measured in Source Area 2 above EPA Removal Management Levels (Target Risk =1E-04; Hazard Index =1) for industrial soils in the 2015 EPA sampling:

Table 2. Source Area 2 Concentrations.

Constituent	Concentration (ug/L)	EPA RML (ug/L)
	2015 Remedial	(Industrial Soil TR 1E-04; HI=1)
Source Area 2. Liquid from Oil/Water Separator		
2-Methylnaphthalene	110	36 (nc)
Benz(a)anthracene	13	3 (c)
Benzo(a)pyrene	6	2.5 (c) / 6 (nc) / MCL 0.2
Naphthalene	220	17 (c) / 6.1 (nc)

TR: Target Risk = 1E-04. HI: Hazard Index = 1. (c): carcinogenic. (nc): non-carcinogenic.

Note: EPA RML for tapwater are used for comparison without surface water comparison values.

Figure 6a. and b. Source Area 3. Unlined Wastewater Pit.



Constituent concentrations were measured in Source Area 3 above EPA Removal Management Levels (Target Risk =1E-04; Hazard Index =1) for industrial soils in the 2015 EPA sampling and again on the October 9, 2019 EPA sampling preliminary assessment:

Table 3. Source Area 3 Concentrations.

Table 5: Source Area 3 Concentrations.

Constituent	Concentration (mg/kg)		EPA RML (mg/kg)
	2015 Remedial	2019 Removal	(Industrial Soil; TR 1E-04; HI=1)
Source Area 3. Sediment from Wastewater Pit			
Thallium	--	25.3	12 (nc)
1,1 Biphenyl	--	5,300	41,000 (c) / 200 (nc)
2-Methylnaphthalene	9,400	37,000	3,000 (nc)
Anthracene	--	240,000	230,000 (nc)
BAP Equivalent	--	4,314	210 (c) / 220 (nc)
Benz(a)anthracene	2,800	8,200	2,100 (c)
Benzo(a)pyrene	--	2,700	210 (c) / 220 (nc)
Benzo(b)fluoranthene	--	3,300	2,100 (c)
Dibenz(a,h)anthracene	--	360	210 (c)
Dibenzofuran	--	25,000	1,000 (nc)
Fluoranthene	--	43,000	30,000 (nc)
Fluorene	--	41,000	30,000 (nc)
Naphthalene	25,000	80,000	1,700 (c) / 590 (nc)
Pyrene	--	28,000	23,000 (nc)

TR: Target Risk = 1E-04. HI: Hazard Index = 1. (c): carcinogenic. (nc): non-carcinogenic.

Additional evaluation by the EPA Remedial Program in 2020 after the temporary Removal Action shut-down indicated the high probability for Site-related gross contamination on the adjacent property to the southeast and requested Removal Program support to address.



Figure 7. Off-site. Potential Site-related gross contamination (location and volume have not been assessed; individual in the figure is the property owner).

4. Release or Threatened Release into the Environment of a Hazardous Substance, or Pollutant or Contaminant

Based on EPA assessments prior to 2019, source material is present in the on-site source areas and along the drainage path. Source material constituents include, but are not limited to, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, 2-methylnaphthalene, and naphthalene. These, along with the constituents listed in section A.3, are hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), and further defined at 40 C.F.R. 302.4.

5. NPL Status

This Site was added to the National Priorities List in January 2018. This Removal Action was requested by Remedial and is consistent with remediation efforts.

6. Maps, Pictures and Other Graphic Representations

As this an amendment to the signed Action Memorandum for a time extension and scope of work, no new attachments are submitted. All attachments are on the initial Action Memorandum.

B. Other Actions to Date

1. Previous Actions

Louisiana Department of Environmental Quality (LDEQ) has worked in the past with the owners of the Site to complete the cleanup; however, no cleanup activities have been initiated on the Site since timber treatment procedures are reported to have ceased in 1957.

2. Current Actions

The EPA Remedial Program began an RI/FS (Remedial Investigation / Feasibility Study) in August 2018, and requested removal support from the EPA Removal Program to address some source material. The initial Removal Action Memorandum was signed on December 18, 2019, and resources mobilized on March 3, 2020 to implement. On March 22, 2020, EPA Region 6 called for a temporary shut-down of field operations due to Covid-19 pandemic conditions across the region. The EPA Removal Program secured the Site with resources on hand and demobilized on March 27, 2020.

C. State and Local Authorities' Role

1. State and Local Actions to Date

In 1991 the American Creosote DeRidder facility was entered into the LDEQ Inactive and Abandoned Sites Division (IASD). LDEQ IASD collected water, soil and sediment samples for analysis in 1992. In 1993, LDEQ IASD completed a Phase I and Phase II State Site Assessment (SSA) and discovered high concentrations of creosote contamination in the unlined pit lying between the old BNSF railway track and the creosoting structure foundation. Low level total

phenols concentrations were also discovered in soil and surface water sampled surrounding the old foundation. LDEQ IASD moved to proceed with an RI/FS and Removal Action through a cooperative agreement with the responsible party identified at the time, Central Manufacturing Co. (CMC). In October 1993, LDEQ IASD realized the contamination resided on two distinct properties, due to creosote contamination migrating from the former wood treatment facility to the adjacent property to the west. LDEQ IASD sent letters to the identified parties: Atchison, Topeka, and Santa Fe Railway (ATSF), who owned the railway ROW corridor, and CMC, who owned the property that held the former wood treating facility. In mid-1995, a cooperative agreement between LDEQ IASD, ATSF, and CMC was entered into to perform interim measures as proposed in the Bio Pile Work Plan. By April 1996, the executed Cooperative Agreement between ATSF, CMC, and LDEQ was dissolved, and ATSF (now BNSF) entered into its own cooperative agreement with LDEQ to begin its own soil remediation strategy. In mid-1996 BNSF submitted a Soil Remediation Work Plan to LDEQ IASD to address the railway corridor impacted by run-off creosote material associated with the adjacent former wood treatment facility, American Creosote DeRidder. To date, no remediation has taken place along the railroad ROW.

The Site was entered into the LDEQ Voluntary Remediation Program (VRP) in September 2002. In late 2003, CMC submitted a Voluntary Remedial Action Plan to LDEQ IASD to address the limited removal of impacted media. In 2005, CMC had Acadian submit a Risk Evaluation/Corrective Action Program (RECAP) to LDEQ IASD. The RECAP was performed within the concept of the VRP to delineate the vertical and horizontal limits of the COPCs identified at the Site. CMC proposed to perform the remediation and implement required institutional controls in accordance with LDEQ approval.

In April 2013, CMC submitted a Corrective Action Plan (CAP) for the American Creosote Site to LDEQ Remediation Services Division. The CAP was based upon the consideration that the creosote COPCs upon the property are consistent with the topography, yet the limited pathways of exposure to the environment and others afford participation within the VRP. It was the intention of the CAP and VRP to isolate and remediate the remaining source of potential impact at the CMC site.

In a December 15, 2016 letter, LDEQ concurred with the proposed listing of the Site on the NPL.

In a letter from LDEQ to CMC on July 10, 2018, LDEQ stated that CMC was removed from the VRP based on listing of the Site on the NPL, and referred to a March 22, 2018 notification from CMC to LDEQ that CMC did not have the financial means or resources to undertake remedial activity at this Site.

EPA continues to coordinate with LDEQ on the Site's progress and activities.

2. Potential for continued State/Local response

At this time, there are no additional actions anticipated by the State or Local Government entities. EPA will continue to coordinate and communicate the progress and activities at the Site with LDEQ.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT AND STATUTORY AND REGULATORY AUTHORITIES

Section 300.415 of the NCP lists the factors to be considered in determining the appropriateness of a removal action. Paragraphs (b)(2)(i), (ii), (iii), (iv), (v) and (vii) directly apply to the conditions at the Site. Any one of these factors may be sufficient to determine whether a removal action is appropriate.

A. Threats to Public Health or Welfare

1. Exposure to Human Populations, Animals or the Food Chain, NCP Section 300.415(b)(2)(i).

Surface runoff flows southwest from the source material areas to the adjacent property to the west, and then southwest along the gradient. Contaminants in the source areas are exposed to the elements and may migrate along the drainage path, as shown in historical sampling results. Trespassers may also be exposed, as the Site is not secured from public access.

2. Actual or Potential Contamination of Drinking Water Supplies or Sensitive Ecosystems, NCP Section 300.415(b)(2)(ii).

Groundwater monitoring wells have been sampled and analyzed for metals and SVOCs (including PAHs). Concentrations of aluminum, arsenic, iron, PAHs, 1,1-biphenyl, carbazole, and dibenzofuran exceed the most conservative screening level in at least one sample. Benzo[a]pyrene concentrations in each of the samples exceed the EPA MCL.

3. Hazardous substances or pollutants or contaminants in drums, barrels, tanks or other bulk storage containers that may pose a threat of release, NCP Section 300.415(b)(4)(iii).

The unlined abandoned waste water pit is located just west of the concrete retort house structure and was the waste pit for the creosote operations at the facility (Attachment 1). The open rectangular pit served as a creosote waste water holding pit for the creosote operations. The pit contained spent creosote waste water which now has contaminated the underlying soil. The unlined waste water pit measures approximately 100 feet by 50 feet with hardened creosote flanking the pit and adjacent to the pit (EPA 2017a). Elevated levels of PAHs, known creosote constituents, were detected in sediment and waste water samples collected from the pit. Additionally, contaminants are present in the oil/water separator and the concrete structure pit/vault and are exposed to the elements.

4. High Levels of Hazardous Substances or Pollutants or Contaminants Soils Largely at or Near the Surface, that May Migrate, NCP Section 300.415(b)(2)(iv).

During the June 2015 EPA SI, sediment was collected from the eastern edge of the abandoned waste water pit. The sample detected elevated metal concentrations including arsenic, cadmium, chromium, cobalt, copper, lead, manganese, mercury, nickel, thallium, and zinc, and indicates that contaminants from the abandoned waste water pit have released and migrated via surface

water run-off. Sample results also indicate contaminants from the source areas have migrated off-site via surface drainage.

5. Weather Conditions that May Cause Hazardous Substances or Pollutants or Contaminants to Migrate or be Released, NCP Section 300.415(b)(2)(v).

Normal precipitation events cause the contaminants in the open pit, oil/water separator/concrete vault to be released into the environment. In addition, the Site is located in an area prone to significant weather events, such as hurricanes and flooding.

6. Availability of Other Response Mechanisms, NCP Section 300.415(b)(2)(vii).

At this time, there are no other mechanisms available to respond and secure the Site conditions as described in this memorandum. CMC indicated to LDEQ in 2018 that they did not have the means nor resources to conduct remediation efforts at the Site. The State and local officials do not have the resources to conduct this response effort. EPA Remedial requested removal support in 2019 consistent with remediation plans in order to remove the priority source areas and prevent further release and migration off-site. No other response mechanisms are available at this time to implement the immediate cleanup activities.

B. Threats to the Environment

At this time, there is not enough data to determine if a significant ecological impact has resulted from the contamination on the Site. It is unknown whether there are endangered species in the area. An observed release by chemical analysis has been documented to impact an unnamed drainage ditch/stream, unnamed perennial stream, freshwater pond, and associated contiguous wetlands. Also, it is unknown whether there are any downstream effects which would impact fish which are consumed by humans.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances, pollutants or contaminants from this Site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to the public health, welfare, or the environment.

V. EXEMPTION FROM STATUTORY LIMITS

This Removal Action is consistent with the goals of the remedial action. Removal of the concentrated source material will remove the primary source of hazardous substances with potentially the highest concentrations from further uncontrolled release and migration along the drainage path and off-site. Removal of off-site contamination will remove potential further impact and potential resident access to the potential gross contamination. This action is expected to result in considerable time and cost savings to the overall project and will be conducted in cooperation with the EPA Remedial Program.

VI. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed Action Description

The proposed action includes the removal of solids, sludges, and liquids from the source areas identified on the Site. This proposed action includes the removal of Site related waste from the surface drainage path and areas between the source areas, as determined to be a threat to public health and the environment. Contaminated soils determined to be of minimal risk of migration or off-site impact due to Site conditions or control measures, may be left in place and the Site returned to the EPA Remedial Program. The removed contaminated soil and liquid waste materials will be transported offsite for treatment and/or disposal in accordance with the EPA Off-Site Rule and other State and Federal regulations. During this Removal Action, the EPA Removal Program will be working closely with the EPA Remedial Program, as program operations may be on-going concurrently. Upon completion of this Removal Action, full control of the Site will be returned to the EPA Remedial Program.

For the EPA Remedial Program request in mid-2020 to remove potential off-site contamination on the property to the southeast, this area will be assessed and addressed upon EPA's remobilization to resume the removal action as Covid-19 pandemic conditions are reduced. Gross contamination will be removed and disposed of consistent with the process that will be used for the removal and disposal of on-site gross contamination.

2. Contribution to Remedial Performance

As indicated by concurrence, this Removal Action is consistent with any potential Remedial Action at this Site. This Removal Action is consistent with the goals of the Remedial Action. Removal of the concentrated source material will remove the primary source of hazardous substances with potentially the highest concentrations from further uncontrolled release and migration along the drainage path and off-site. This action is expected to result in considerable time and cost savings to the overall project and will be conducted in cooperation with the Remedial Program.

3. Description of alternative technologies

At this time, there are no other proven alternative technologies that could feasibly be applied at this Site. The appropriate action is to conduct the Removal Action on the Site as described in this memorandum. If an equally protective and less expensive technology is later identified, it may be considered.

4. Applicable or Relevant and Appropriate Requirements (ARAR's)

This Removal Action will be conducted to eliminate the actual or potential release of a hazardous substance, pollutant, or contaminant to the environment, pursuant to CERCLA, 42 U.S.C. § 9601 et seq., in a manner consistent with the NCP, 40 C.F.R. Part 300. As per 40 C.F.R. § 300.415(i), Fund-financed removal actions pursuant to CERCLA Section 104, 42 U.S.C. § 9604, and removal

actions pursuant to CERCLA Section 106, 42 U.S.C. § 9606, shall, to the extent practicable considering the exigencies of the situation, attain the applicable or relevant and appropriate requirements under Federal environmental law, including the Toxic Substances and Control Act (TSCA), 15 U.S.C. § 2601 et. seq., the Safe Drinking Water Act (SDWA), 42 U.S.C. § 300 et. seq., the Clean Air Act (CAA), 42 U.S.C. § 7401 et. seq., Clean Water Act (CWA), 33 U.S.C. § 1251 et. seq., the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6901 et. seq., or any promulgated standard, applicable or relevant and appropriate requirements, criteria, or limitation under a state environmental or facility citing law that is more stringent than any Federal standard, requirement, criteria, or limitation contained in a program approved, authorized or delegated by the Administrator and identified to the President by the state.

Due to the fact that consolidation and off-site treatment and/or disposal are the principal elements of this Removal Action, RCRA waste analysis requirements found at 40 C.F.R. §§ 262.11, 261.20 and 261.30, RCRA manifesting requirements found at 40 C.F.R. § 262.20 for Large Quantity Generators (LQG) and Small Quantity Generators (SQG) only, and RCRA packaging and labeling requirements found at 40 C.F.R. § 262.30-32 are deemed to be relevant and appropriate requirements for this Removal Action. Because on-site storage of hazardous wastes by EPA is not expected to exceed ninety days, specific storage requirements found at 40 CFR Part 265 are not applicable or relevant and appropriate (See 40 CFR § 262.16 for SQGs and 262.17 for LQGs). All hazardous substances, pollutants, or contaminants removed off-site for treatment, storage, or disposal shall be treated, stored, or disposed at a facility in compliance, as determined by EPA, pursuant to 40 CFR § 300.440. All off-site transportation of hazardous materials will be performed in conformity with U.S. Department of Transportation (DOT) requirements at 49 CFR § 172.

5. Project Schedule

After Covid-19 pandemic conditions have lessened and travel restrictions are lifted, the EPA anticipates remobilizing and resuming the Removal Action as quickly as possible to address the issues associated with the Site. Following potential impact of the Site from multiple hurricanes or tropical storms in 2020, the estimated time to complete the Removal Action is approximately six to eight weeks provided no unforeseen Site conditions are encountered. Without assessment by the Removal Program of the potential for gross contamination on the adjacent property to the southeast, a more definitive time estimate cannot be provided; however, it is estimated that this additional work could be completed within the 12-month extension beginning upon remobilization of the Removal Program resources.

B. Estimated Costs

Extramural Costs:	Initial	Requested	Subtotal
ERRS	\$3,442,000	Zero	\$3,442,000
START	\$231,273	Zero	\$231,273
Total Extramural	\$3,673,273	Zero	\$3,673,273
Site Contingency (20%)	\$734,655	Zero	\$734,655
CEILING (from Special Acct funding):	\$4,407,928	Zero	\$4,407,928

Intramural costs are estimated at \$216,128. It is projected without on-site assessment that it may

be possible to cover the additional tasking associated with this amendment to the Action Memorandum Scope of Work with contingency funding. If the additional work is determined to be greater than the allocated and approved Removal Action ceiling with contingency funding included, a second amendment to the action memorandum will be submitted for approval to raise the project ceiling.

VII. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

If this response action is not taken, potential for human exposure to contaminants at the Site will remain unabated. The current neighboring and/or downstream residents may continue to be exposed to the contaminated soils, and surrounding residents can potentially be exposed to the contaminated soils, surface water, and sediment. In addition, these contaminated soils may migrate with wind, water, and mechanical means which could result in the contamination of additional areas around the Site. The remedial options will be limited and may result in longer and more costly action.

VIII. OUTSTANDING POLICY ISSUES

There are no known outstanding policy issues associated with this Site.

IX. ENFORCEMENT

The total cost for this Removal Action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be \$6,801,524.

(Direct Cost) + (Other Indirect Costs) + 47.09% (Direct + Indirect Costs) = Estimated EPA Cost

$$\$4,407,928 + \$216,128 + 47.09\% (\$4,407,928 + \$216,128) = \$6,801,524$$

Direct costs include direct extramural costs. Other indirect costs include direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2002. The estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only, and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor the deviation of actual total costs from this estimate will affect the United States' right to cost recover.

X. RECOMMENDATION

This decision documents the selected Request for Exemption from the 12-Month Statutory Limitation and Scope of Work amendment to the December 18, 2019 signed Action Memorandum for the Removal Action for the American Creosote DeRidder Superfund Site, DeRidder, Beauregard Parish, Louisiana developed in accordance with CERCLA, 42 U.S.C. § 9601 et seq., and not inconsistent with the NCP, 40 C.F.R. Part 300. This action was based on the administrative record for the Site.

Because the conditions at the Site meet the criteria defined in Section 300.415 and 300.305 of the NCP, I recommend your approval of the proposed Removal Action.

WREN STENGER

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DATE: _____

Wren Stenger, Director
Superfund and Emergency Management Division (6SED)